

TIFFANY JONES  
2962 CHERRYLAND ROAD  
Baltimore, Maryland 21225

Plaintiff

v.

WALMART, INC.  
701 SOUTH WALTON BLVD  
Bentonville, AR 72716

Serve on:

**Resident Agent**

The Corporation Trust, Inc.  
2405 YORK ROAD  
Baltimore, Maryland 21093

Defendant

\* IN THE  
\* CIRCUIT COURT  
\* OF MARYLAND  
\* FOR BALTIMORE CITY

\*  
\* Case No.: \_\_\_\_\_

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### COMPLAINT

Plaintiff, Tiffany Jones (hereinafter "Plaintiff"), by her attorney, Brandon C. James, Esq., and the Law Office of Barry Glazer, LLC, hereby files suit against Defendant Walmart, Inc., (hereinafter "Defendant") and, in support thereof, states as follows:

1. Plaintiff is now and at all times relevant to this suit was a resident of Baltimore City, Maryland.
2. Upon information and belief, Defendant is a business entity in Maryland engaged in the business at 3601 Washington Blvd, Halethorpe, Maryland.
3. On or about the afternoon of July 2, 2022, Plaintiff entered the premises of the Walmart at 3601 Washington Blvd, Halethorpe, Maryland. Upon entering, the Plaintiff's arm was shut in the automatic door and trapped.

COUNT I  
(Negligence)

4. The allegations of fact hereinabove and below are set forth, are adopted herein, and made a part hereof, and further,

5. At the time of the incident, Defendant, its agents, servants and employees, owed a duty of care to Plaintiff, as an invitee, to use ordinary care in maintaining the premises under its control in a reasonably safe condition. This duty included, but was not limited to, inspecting and maintaining the facility services Defendant provided to the premises. This duty further required Defendant to correct any dangerous and defective conditions which existed on the premises and of which it was aware or reasonably should have been aware.

6. Defendant breached its duty of care to the Plaintiff when its agents, servants, and employees failed to correct or place warning signs of the dangerous condition of the door, failed to correct the dangerous condition of the door, and failed to warn Plaintiff of the dangerous condition which existed on the premises.

7. The dangerous condition of the door was not discoverable by Plaintiff when exercising ordinary care for her safety.

8. Defendant's breach of its duty of care was the direct and proximate cause of serious bodily injuries, pain, and mental distress suffered, and medical bills incurred by Plaintiff, without any negligence or want of due care on Plaintiff's part contributing thereto.

**WHEREFORE**, Plaintiff demands judgment against Defendant in an amount greater than Seventy-Five Thousand Dollars and no cents (\$75,000.00), exclusive of interest and costs.

**DEMAND FOR JURY TRIAL**

Plaintiff, does hereby demand a trial by jury on all counts.

Respectfully submitted,

Law Office of Barry Glazer, LLC



Brandon C. James, Esq.

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*Attorney for Plaintiff*